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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

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UNITED STATES OF AMERICA	:	<b>SEALED CRIMINAL</b>
	:	<b>COMPLAINT</b>
-v-	:	
	:	Mag. No. 22-9168
FA DENG,	:	
ALBERT FERRELLI, and	:	
CHIAHAO LEE	:	

I, Special Agent John Havens, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

**SEE ATTACHMENT A**

I further state that I am a Special Agent with the Federal Bureau of Investigation, and that this complaint is based on the following facts:

**SEE ATTACHMENT B**

continued on the attached pages and made a part hereof.

by phone  
\_\_\_\_\_  
Special Agent John Havens  
Federal Bureau of Investigation

Special Agent John Haven attested to this Complaint by telephone pursuant to Federal Rule of Criminal Procedure 4.1(b)(2)(A) on April 7, 2022 in New Jersey.

Hon. Cathy L. Waldor  
United States Magistrate Judge

s/Cathy L. Waldor 4/7/22  
\_\_\_\_\_  
Signature of Judicial Officer

**ATTACHMENT A**

**Count 1**  
**(Conspiracy to Commit Kidnapping)**

From at least on or about April 5, 2022 through on or about April 6, 2022, in the District of New Jersey and elsewhere, the defendants,

FA DENG,  
ALBERT FERRELLI, and  
CHIAHAO LEE

knowingly and intentionally conspired and agreed with others, and committed an overt act to effect the object of their conspiracy, to unlawfully seize, confine, inveigle, decoy, kidnap, abduct, and carry away and hold for ransom and reward and otherwise a person, and the person was willfully transported in interstate and foreign commerce and a means, facility, and instrumentality of interstate or foreign commerce was used in committing and in furtherance of the commission of the offense.

In violation of Title 18, United States Code, Section 1201(c).

**ATTACHMENT B**

I, John Havens, am a Special Agent with the Federal Bureau of Investigation. I have knowledge of the following facts based upon both my investigation and discussions with other law enforcement personnel and others. Because this Affidavit is being submitted for the sole purpose of establishing probable cause to support the issuance of a complaint, I have not included each and every fact known to the government concerning this matter. Where statements of others are set forth herein, these statements are related in substance and in part. Where I assert that an event took place on a particular date, I am asserting that it took place on or about the date alleged.

1. On or about Wednesday, April 5, 2022, VICTIM 1 resided at 440 Catherine Street, Fort Lee, New Jersey ("440 Catherine Street").

2. Also on or about Wednesday, April 5, 2022, at approximately 9:52 p.m., the Fort Lee Police Department received a call from WITNESS 1, who resided at 446 Catherine Street, Fort Lee, New Jersey ("446 Catherine Street"), which abutted 440 Catherine Street. According to WITNESS 1, he/she looked inside 440 Catherine Street from his/her kitchen window and saw two unknown men walking around inside. WITNESS 1 then called the police to check on VICTIM 1.

3. At approximately the same time, WITNESS 2, who is a friend of VICTIM 1, also called the Fort Lee Police Department and reported that VICTIM 1's wife, who resides in China, texted WITNESS 2 a photo of VICTIM 1 with duct tape over his eyes and mouth and said that individuals (the "Suspects") had contacted her, demanding a ransom of approximately \$680,000.00 USD. WITNESS 2 also reported that the individuals contacting VICTIM 1's wife used the phone number (XXX)XXX-5447.

4. Law enforcement subsequently responded to 440 Catherine Street, and saw what appeared to be used duct tape on the floor with pieces of what appeared to be latex gloves stuck to it.

5. Law enforcement reviewed surveillance camera footage from various residences in the area of 440 Catherine Street and identified a gray minivan, bearing Oregon license plate number 193GNV (the "Suspect Vehicle"), which is believed to have been used to transport the kidnapping victim. The surveillance footage showed the Suspect Vehicle driving in the vicinity of 440 Catherine Street from approximately 8:14 p.m. to approximately 8:33 p.m. A law enforcement database check showed that the license plate number was registered to a 2010 Toyota Rav 4, not the Suspect Vehicle, indicating that the plates were improperly affixed to the Suspect Vehicle. In addition, a check of law enforcement Automated License Plate Reader ("ALPR") databases showed that the Suspect

Vehicle had crossed the George Washington Bridge into New Jersey at approximately 8:02 p.m. that same night.

6. The surveillance footage showed that the Suspect Vehicle parked at approximately 8:33 p.m. and two men walked from the Suspect Vehicle toward the victim's residence. Surveillance footage appears to show an additional two individuals remained in the Suspect Vehicle. At approximately 8:53 p.m., a man can be seen walking toward the Suspect Vehicle, and at approximately 8:54 p.m., the Suspect Vehicle drove away from the area.

7. According to ALPR records, the Suspect Vehicle then: crossed back over the George Washington Bridge into New York at approximately 9:00 p.m.; crossed the Alexander Hamilton Bridge into the Bronx, New York at approximately 9:04 p.m.; and crossed the Whitestone Bridge into Queens, New York at approximately 9:10 p.m.

8. Later that night, at approximately 11:38 p.m., New York City Police Department ("NYPD") officers responded to the area of 33-70 Prince Street, Queens, NY based on a 911 call that reported a man in the area screaming and possibly bound. NYPD officers checked the area with negative results.

9. On or about the next day, April 6, 2022, around noon, NYPD returned to the area of 33-70 Prince Street, Queens, NY and saw the door of 33-70 #C13 Prince Street, Queens, NY open and FERRELLI guarding the door. When NYPD officers approached FERRELLI, they heard a man screaming for help from inside the building. The officers entered the premises and located VICTIM 1, who was blindfolded with his hands bound, and duct tape over his mouth and eyes. While speaking to FERRELLI, law enforcement officers observed another individual, later identified as DENG, approaching the building. DENG then fled on foot, and was apprehended by law enforcement. FERRELLI stated in sum and substance and in part that DENG was his boss and told him to watch the door. FERRELLI was taken into custody, and made a spontaneous voluntary statement, in sum and substance and in part, that he was charged with watching an Asian male inside the building.

10. After his rescue, VICTIM 1 told law enforcement that he was abducted from his home at 440 Catherine Street the previous night. He reported that masked men entered his home, and at least one of the men was carrying a firearm.

11. Law enforcement located a gray Chrysler Pacifica, matching the description of the Suspect Vehicle, bearing Pennsylvania license plate LVL4312 in the driveway of LEE's residence. Rental car records revealed that the Subject Vehicle was rented at LaGuardia Airport on April 4, 2022 by LEE's wife, and was due to be returned on April 6, 2022.

12. Law enforcement detained LEE, who voluntarily admitted that he was involved in VICTIM 1's kidnapping. He stated in sum and substance and in part that he and an individual he knows as "Jay" or "B" asked him on or about Sunday, April 3, 2022, to rent a car. LEE identified a photograph of DENG as being the individual he knew as "Jay" or "B." LEE also stated in sum and substance and in part that he met DENG on or about Tuesday, April 5, 2022 at approximately 7 p.m. in Queens. They picked up an individual known to LEE as "X" and an additional individual, and drove to Fort Lee, where "X" and the other individual entered a house while he and DENG remained in the car. "X" and the other individual then returned to the car with an individual who was duct taped and bound, and the group drove to 33-70 Prince Street with the victim. LEE identified a photograph of FERRELLI as being the individual he knew as "X."

13. LEE also reported in sum and substance and in part that DENG made the calls demanding money for the victim. LEE showed law enforcement agents his cellular phone, which showed calls with the telephone number (XXX) XXX-5447. LEE identified that number as belonging to DENG.

14. On or about April 6, 2022, the Honorable Lois Bloom, U.S. Magistrate Judge in the Eastern District of New York, authorized a search of 33-70 Prince Street and 33-70 #C13 Prince Street in Queens, NY. Upon executing the search, law enforcement officers located surveillance video footage taken outside the entrance of 33-70 #C13 Prince Street, Queens, NY. The footage shows that, on or about April 5, 2022 at approximately 10:33 p.m., an individual appearing to be VICTIM 1 attempted to run out of the front door and up the steps to the sidewalk. A male appearing to be FERRELLI, who had been positioned at the top of the stairs on the sidewalk, tackled VICTIM 1. A physical struggle ensued. FERRELLI can be seen attempting to choke VICTIM 1 in the struggle. FERRELLI then grabbed VICTIM 1 and pulled him back into 33-70 #C13 Prince Street, Queens, NY.